UNITED STATES DISTRICT COURT MASSACHUSETTS DIVISION

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IVAN VELEZ

-vs-

Defer	ıdant.	
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MOTION FOR RECOMMENDATION FOR LOCATION AND TYPE OF PRISON FACILITY

COMES NOW the Defendant, Ivan Velez, by and through his undersigned counsel and moves this Honorable Court, that the defendant shall be housed in a facility closest to his home in Miami, FL

- 1. The Defendant was sentenced on September 19, 2006.
- The Defendant was sentenced to 30 months in prison, followed by a term of supervised release.
- 3. The Defendant resides in Miami, FL with his wife and minor daughter.
- 4. The Defendant respectfully requests that he be housed in a facility closest to Miami so that his wife and family may visit him
- 5. Additionally, the defendant respectfully requests that he be housed in a camp facility as he has no prior arrests, is a U.S. citizen, has never possessed a firearm, was convicted of a non-violent offense, namely, money laundering, and complied exemplary with his pre-trial release conditions during the last 29 months.
- Assistant United States Attorney, Suzanne Sullivan, has no objections to the foregoing motion.

WHEREFORE the Defendant prays this Honorable Court grant his motion for recommendation for location and type of prison facility.

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed to the United States Attorney's Office, at 1 Courthouse Way, Suite 9200, Boston, Massachusetts 02210 on this 20th day of September 2006.

Respectfully submitted,

Percy Martinez, Esq.

The Alhambra

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